

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
READING DIVISION**

In Re: TOMMY TAM, Debtor	Chapter 13 Bankruptcy Bankruptcy No. 17-17147 PMM
---	--

NOTICE OF MOTION, RESPONSE DEADLINE, AND HEARING DATE

TO: U.S. TRUSTEE, CHAPTER 13 TRUSTEE, ALL CREDITORS AND OTHER PARTIES IN INTEREST, NOTICE IS GIVEN THAT:

Debtor filed a Motion to Sell Real Estate Free and Clear of Liens and Encumbrances, to Approve Broker's Commission and Escrow of Funds for Attorney's Fees ("Motion"). Pursuant to the terms of the Motion, the Debtor intends to sell a parcel of real estate owned by the Debtor located at 1608 West Leesport Road, Leesport, PA 19533, Berks County (the "Premises") for the sum of \$425,000.00. If a copy of the Agreement of Sale is not enclosed with this Notice, a copy of the Agreement of Sale can be obtained by contacting counsel to the Debtor, George M. Lutz, Esquire, at Hartman, Valeriano, Magovern and Lutz, PC, 1025 Berkshire Boulevard, Suite 700, Wyomissing, PA 19610, Ph.: 610-763-0745, Email: glutz@hvmllaw.com, fax: 1-610-779-7473.

Additional distribution of sale proceeds is set forth in the Motion, a copy of which has been served upon you.

Any creditor or any party in interest may file an answer, objection, or other responsive pleading with respect to this Motion with the Clerk of the United States Bankruptcy Court, The Gateway Building, Office of the Clerk, Room 103, 201 Penn Street, Reading, PA 19601, and must **deliver** a copy to counsel for the Debtor, whose name and address appears below, such that counsel for the Debtor **receives** said copy on or before January 13, 2022 at 4:00 p.m.

A hearing to consider the Motion and any answers, objections, or other responsive pleadings has been scheduled for January 20, 2022 at 11:00 a.m. in The Gateway Building, 4th Floor Courtroom, 201 Penn Street, Reading, PA 19601. In the absence of any answer, objection, or other responsive pleading, the Court may approve the sale requested in Motion.

Dated: December 12, 2021

**George M. Lutz, Esquire
Hartman, Valeriano, Magovern & Lutz, PC
1025 Berkshire Boulevard, Suite 700
P.O. Box 5828
Wyomissing, PA 19610**